

Comments on Sand Island WWTP revised draft 10/24/13

1. Page 4 under section A.1. states "...lasting through the expiration date..." Recommend changing this to "lasting until the expiration date." Recommend this change be applied to interim effluent limits for enterococcus as well on page 6-7, section 6.a. (instead of through Dec., state until Dec.)
2. Fix header in Table under Section A.1. Should be "measurement frequency" so that "measurement is not split.
3. Page 5, footnote 6 states that the entero limit is "daily geomean." This should be a single sample maximum to be consistent with Honouliuli.
4. Page 5, table for ammonia includes header "effluent limitations," when the previous tables that include effluent limitations have a header of "discharge limitations." These should be consistent with each other.
5. Recommend including ammonia effluent limitations within main effluent limitation table, such as was done in Honouliuli.
6. The compliance schedule for entero is not consistent with the Consent Decree. It does not include the 2022 milestone from the consent decree. It should also require compliance by 2035 if that is the path they follow for the upgrades to secondary. We should work on the language here. It would not meet the requirements of 40 CFR 122.47 for "as soon as possible" if they go to secondary by 2035, but the schedule allows them to exceed their entero limit until 2038.
7. The compliance schedule table for entero should include a row for the annual report requirement, as was done in Honouliuli.
8. Page 9 – remove "difficulty obtaining gametes" language as this is no longer an issue.
9. Page 10, section 4.c. should only require lab dilution water (not receiving water for dilution water).
10. Page 21 requires monitoring of nutrient parameters at nearshore stations. Is this consistent with the previous permit? Not clear why this is not required in the Honouliuli permit. Are they not consistent?
11. Page 22 should include language to link offshore monitoring with ZOM limits, as was discussed for Honouliuli.
12. Page 23 requires that sediment monitoring be conducted at both nearshore and offshore stations, but in Honouliuli, they are only required to monitor sediments at offshore stations (even though the header of the section states "nearshore and offshore"). Why are they inconsistent?

13. Page 24 only requires sediment chemistry testing during the first two years, whereas, the Honouliuli permit requires annual monitoring for the whole permit term. Why are they inconsistent?
14. Page 33 – please add back in the urban area pretreatment requirements to be consistent with the decision on Honouliuli, and amend the fact sheet justification on page 58 to be consistent with the Honouliuli fact sheet.
15. Page 36 includes reporting addresses for the annual pretreatment report – this is not in Honouliuli – please amend Honouliuli.
16. Page 50 table of submittal dates is missing the ZOM study deliverables.
17. Page 53, section (4) and same page under section 3 (other reporting requirements) include a statement that the permittee shall comply with the consent decree. This was not included in the Honouliuli permit. We should discuss whether this is necessary.
18. Fact Sheet, page 5 – use 2012 303(d) list.
19. Fact Sheet, page 8 states, “it is thought to...” under both the chlordane and dieldrin footnotes. Recommend removing this language unless there is a study to cite.
20. Fact Sheet, page 19 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum.
21. Fact Sheet, page 23 includes an antideg discussion regarding which dilution to use and states that the dilution factors are appropriate for human health standards, but removes the reference to chronic aquatic life standards. These both are true, so why was the reference removed?
22. The period of data used for RPA and assimilative capacity assessment should include the most recent data. The fact sheet cites data up through 2011 and in some cases up through October 2012, but that was a year ago.
23. Fact Sheet, page 30 includes a paragraph starting with “because the assimilative capacity at the edge of the ZOM...” This is not the same as the dilution factor representative of the edge of the ZOM. This paragraph is confusing. Please clarify.
24. Fact Sheet, page 31 – the whole nitrate+nitrite section was removed, and the data in the RPA was changed for this pollutant. Please explain.
25. Fact Sheet, page 33 discussion of applicable enterococcus water quality standards: recommend citing CFR, where it discusses the criteria are applicable to Hawaii.
26. Fact Sheet, page 33 – it is not clear why it is appropriate to use the 103:1 dilution factor here, rather than the 94:1 dilution factor carried over for chlordane and dieldrin. Please clarify.

27. Fact Sheet, page 34 – the WQBEL calculations for entero are not performed the same here, as they are in Kailua. In fact, the WQBEL calculations for entero are consistent with Honouliuli. In this permit and Honouliuli, they are calculated as a direct multiplication of the criteria and the dilution factor; however in Kailua, the formula includes adding the criteria to this value. The approach to WQBEL calculations should be consistent for all three facilities.
28. Fact Sheet, page 37 cites the date of the draft method for *T. gratilla*. Please remove.
29. Fact Sheet, page 39 states that an increase in flow from 82 MGD to 90 MGD was authorized by the previous permit. Please explain, as this is not consistent with the previous draft of this permit.
30. Fact Sheet, page 41 – the footnotes to Table F-9 do not look accurate. Please double-check. Also, the footnotes imply that ammonia is a maximum daily geometric mean. This does not seem accurate. Please amend.
31. Fact Sheet, page 42 includes a justification for the less stringent max daily mass-based limits for chlordane and dieldrin. This is not clear. Please provide additional justification.
32. Fact Sheet, page 46, the footnotes to Table F-13 do not appear updated according to the data changes within the table.
33. Fact Sheet, page 53, section 2.c. the end of the sentence should state both nitrate + nitrite and turbidity (it currently refers only to turbidity).